

Attorneys for Defendants
Techalloy Co., Inc.,
Rahns Specialty Metals, Inc.,
Thomas & Betts Corp.

the offices of Drinker Biddle & Reath LLP, One Logan Square, 18th and Cherry Streets, Philadelphia, PA 19103 on March 18, 2005 beginning at 9:00 a.m., or at such other date and time as may be scheduled by agreement of the parties. This examination is to be conducted from day to day or upon such adjourned date(s) as may be agreed upon until concluded.

The deponent will be Plaintiff Boarhead Farm Group Agreement (on behalf of itself and its members), by its representative or representatives designated pursuant to Fed. R. Civ. Pro. 30(b)(6) with regard to the following matters:

1. The volume of waste generated by each of the following entities that was disposed at the Boarhead Farm Superfund Site (the "Site"):

- A. Each non-settled Defendant;
- B. Each settled Defendant;
- C. Each BFAG member;
- D. Every other entity or person that BFAG believes is a liable party under CERCLA or HSCA with respect to the Site.

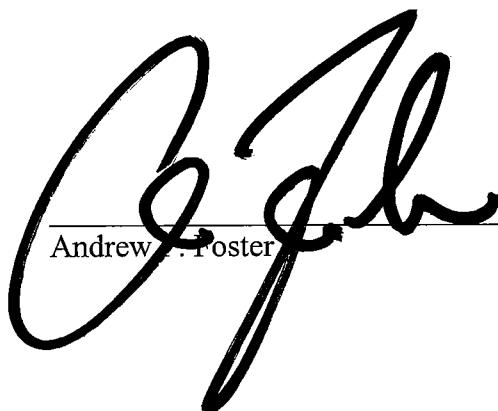
2. The types and amounts of hazardous substances contained in waste generated by each of the following entities that was disposed at the Site:

- A. Each non-settled Defendant;
- B. Each settled Defendant;
- C. Each BFAG member;
- D. Every other entity or person that BFAG believes is a liable party under CERCLA or HSCA with respect to the Site.

3. The share of liability for past and future Site response costs that Plaintiff

BFAG asserts should be borne by each of the following entities:

- A. Each non-settled Defendant;
- B. Each settled Defendant;
- C. Each BFAG member;
- D. Every other entity or person that BFAG believes is a liable party under CERCLA or HSCA with respect to the Site.



Andrew J. Foster

Dated: March 9, 2005